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June 19, 2001

VIA FACSIMILE AND FEDERAL EXPRESS



SDMS DocID 000218100

Ms. Michelle Lauterback
Enforcement Counsel
U.S. Environmental Protection Agency
Region I
Office of Environmental Stewardship
1 Congress Street (SES)
Boston, Massachusetts 02114-2023

Rec'd 6/19/01
11:09
017100

Re: Request for Information to Armstrong Cork Company
Braintree, Massachusetts facility
Peterson/Puritan, Inc. Superfund Site
Cumberland, Rhode Island

Dear Ms. Lauterback:

Enclosed is the response of Armstrong World Industries, Inc., formerly known as Armstrong Cork Company, to the above-referenced Request for Information. Armstrong has conducted a thorough investigation and has made every effort to be responsive. Enclosures referenced in the response will be omitted from the fax due to volume, but will be included in the package delivered to you by overnight mail.

If you have any questions or comments regarding the information contained in this response or any other matter, please do not hesitate to contact me at the above address and telephone number. Regards.

Very truly yours,

Elizabeth B. Davis

EBD:ssk

Enclosures

cc: Mr. Peter A. Scaccia
Mr. Richard DeVuono

ARMSTRONG WORLD INDUSTRIES, INC.'S RESPONSE
TO THE U.S. EPA'S INFORMATION REQUEST
REGARDING THE PETERSON/PURITAN, INC. SITE
CUMBERLAND, RHODE ISLAND

Armstrong World Industries, Inc. ("Armstrong") hereby responds to the CERCLA 42 U.S.C. § 9604 Information Request sent to it by the United States Environmental Protection Agency ("EPA") in February, 2001. Armstrong has provided a separate narrative response to each question and subpart of each question. Armstrong responds to the questions posed subject to the following objections. Armstrong objects to EPA's Information Request to the extent that the questions, either by themselves or in conjunction with the definitions or instructions contained therein, seek disclosure of information or documents that are protected by the attorney-client privilege or the attorney work-product doctrine. Armstrong objects to EPA's Definition No. 1 as being overbroad as relating to this request. Armstrong operates facilities throughout the United States and internationally. However, this response is limited to Armstrong's former Braintree plant, which is the plant to which this Information Request was addressed. This response is limited to the Braintree plant and shall be referred to as "Braintree." Armstrong further objects to Definitions 3, 4, and 5 requiring that an individual, business entity and/or documents, respectively, state all of the information set forth in the request. Armstrong believes that identifying the last-known business address, business telephone number, last-known home address and home telephone number is unduly burdensome. Armstrong will provide the information requested to the best of its ability. Armstrong also objects to questions in Section 2 as overbroad, immaterial and irrelevant to this Information Request. Without waiving its objection, Armstrong has provided its most recent Form 10-K filed with the Securities and Exchange Commission which provides information responsive to CERCLA Section 104(e)(2)(C).

Without waiving and subject to these objections, Armstrong responds as follows:

QUESTIONS AND RESPONSES

1. General Information About Respondent

a. Provide the full legal name and mailing address of the Respondent.

Armstrong World Industries, Inc.
2500 Columbia Avenue
Lancaster, PA 17604

b. For each person answering these questions on behalf of Respondent, provide full name, title, business address, business telephone number and fax machine number.

Elizabeth B. Davis
Womble Carlyle Sandridge & Rice, PLLC
3500 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
t) 404-962-7542
f) 404-870-8187

Peter A. Scaccia
Director, Environment, Health and Safety
2500 Columbia Avenue
Lancaster, PA 17604
t) 717-396-5589
f) 717-396-5577

Robert E. Mervos
Walter R. Schlemmer
Matthew H. Cook

These individuals are current or former employees of Armstrong World Industries, Inc. If necessary, they may be contacted through counsel.

Talbert Lauter
Director of Human Resources
Cole Hersee Corp.
20 Old Colony Ave.
South Boston, MA 02127 - 2467

- c. **If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so note.**

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- d. **State every address in Rhode Island or within 60 miles of Site at which Respondent conducted business during the period investigated.**

Armstrong World Industries, Inc.
Braintree Plant
10 Plain Street
Braintree, MA 02185

e. State the dates during which Respondent conducted business at each such location.

1936 -- 1996. The Braintree Plant was closed and the former Braintree Plant site property was sold in 1996.

f. Describe the nature of Respondent's current businesses at each location.

As set out above, Respondent does not currently conduct business at the Braintree Plant.

g. List the SIC code for the business at each such location.

The SIC Code for the plant was 3069 -- Fabricated Rubber Products, Not Elsewhere Classified.

h. Describe the nature of the Respondent's business at each location during the period being investigated.

During the period 1954 to 1986, the Braintree plant was a manufacturing site for Armstrong World Industries. The plant manufactured elastomeric rubber insulation in both sheet and tube form. In addition, the plant also manufactured elastomeric rubber textile mill supplies commonly known in the trade as "cots and aprons," and cork, cork and rubber gaskets, and rubber gaskets. The plant also manufactured rubberized floor tile at the plant from the late 1930s to the late 1960s.

i. For each location, identify all survey, studies and collections of data for which the Respondent has submitted information to local, state, federal or private entities about its waste disposal/recycling practices.

Respondent has no such information regarding the Braintree plant.

j. Provide a copy of the information submitted.

Respondent has no such information regarding the Braintree plant.

k. Provide a copy of the resulting survey, study or collection of data.

Respondent has no such information regarding the Braintree plant.

2. **Respondents Legal and Financial Status**

a. **State the number of Respondent's current employees.**

Armstrong no longer owns or operates the former Braintree plant and therefore has no current employees at Braintree. Armstrong has approximately 15,400 employees worldwide.

b. **State the annual average number of persons employed by Respondent for every 5 year period during the period being investigated.**

Armstrong does not have information responsive to this request for information.

c. **If the Respondent has ever done business under any other name, list each such name and the dates during which Respondent used such name.**

From 1860 until approximately 1977, Armstrong operated as Armstrong Cork Company .

d. **Provide financial information for each of the last 5 years including total sales, net income, depreciation, total assets, total liabilities and net working capital (or net current assets).**

In response to this information request, Armstrong encloses a copy of the 10-K SEC filing for Armstrong Holdings, Inc. and Armstrong World Industries, Inc. for the fiscal year ending December 31, 2000.

e. **For Respondents who are individuals**

Not applicable.

f. **If Respondent is corporation, provide date of incorporation, state of incorporation, agent for service of process, names of current officers and directors, names of current shareholders owning more than 5% of Respondent's stock, names of all officers, directors and shareholders owning more than 5% of Respondent's stock during the period being investigated.**

See objections and 10-K Report enclosed with this response.

g. **If Respondent is a Partnership**

Not applicable.

h. **If Respondent is a trust**

Not applicable.

- i. **If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship.**

See objections and 10-K Report enclosed with this response.

- j. **Identify all of Respondent's predecessors in interest and process a description of the relationship between Respondent and each of those predecessors in interest.**

Neither the Braintree plant nor Armstrong has any predecessors in interest in this matter. From 1860 until approximately 1977, Armstrong operated as Armstrong Cork Company .

- k. **If Respondent no longer exists**

Not applicable.

- l. **If Respondent no longer exists as same legal entity**

Not applicable. From 1860 until approximately 1977, Armstrong operated as Armstrong Cork Company.

- m. **If Respondent is a governmental entity**

Not applicable.

- n. **If Respondent has filed for bankruptcy, provide:**

U. S. Bankruptcy Court in which the petition was filed;	District of Delaware
Docket number of such petition	00 - 4469, 00 - 4470, 00 - 4471
Date Bankruptcy petition was filed	December 6, 2000
Whether the petition is under Chapter 7, Chapter 11 or other provision	Chapter 11
Brief description of the current status of the petition	The Court has set a bar date for general claims of August 31, 2001.

3. Information About Others

- a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site which is not included in the information you have already provided, provide all such information.**

Armstrong has no such information.

- b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detail or complete response to any of these questions or who may be able to provide additional responsive document, identity such person and the additional information that they may have.**

Armstrong knows of no such persons.

- c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at or transportation of materials to, the Site.**

Armstrong has no such additional information.

4. Compliance with this Request

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:**
- i) names of all individuals consulted**
 - ii) the current job title and job description of each individual consulted**
 - iii) the job title and job description during the period being investigated or each individual consulted**
 - iv) whether each individual consulted is a current or past employee of Respondent**
 - v) the names of all division or offices of Respondent for which records were reviewed**
 - vi) the nature of all documents reviewed**
 - vii) the locations where those documents reviewed were kept prior to review and**
 - viii) the location where those documents reviewed are currently kept**
- 1) Robert E. Mervos**
Senior Staff Engineer, Manufacturing Technical Services, Armstrong Building Products

Provides electrical engineering and project engineering services for various projects for manufacturing capital and process improvements. Former Plant Engineering manager at Braintree plant; Managed engineering and maintenance services for the Braintree plant. Current employee

- 2) Walter R. Schlemmer
Senior Staff Engineer, Manufacturing Technical Services, Armstrong Building Products
Provides mechanical engineering and project engineering services for projects for manufacturing capital and process improvements.
Project Engineer, Insulation Products -- Provided technical engineering support to new product and process development projects
Current Employee
- 3) Matthew H. Cook
Manager, New Product Development, Armstrong Building Products -- Manages new product development process and projects including chemists and engineers.
Plant Chemist, Supervisor, Manufacturing Manager -- Provided chemist process support to operation, supervised line operations, managed manufacturing operations for specific area operations.
Current Employee
- 4) Talbert Lauter
Manager of Human Resources
Cole Hersee Corp.
Former Plant industrial engineer, Plant Industrial Engineering Manager -- Provided industrial engineering services to operation.
Former Employee
- 5) Peter A. Scaccia
Director, Environment, Health & Safety
Armstrong World Industries, Inc.
2500 Columbia Avenue
Lancaster, PA 17603
Responsible for managing and implementing corporate environmental compliance program and managing environmental issues.
Current employee.

The Braintree plant is closed. Any remaining records are at Armstrong corporate storage. Documents reviewed were product and purchasing records for available periods (going back to 1977). The documents are kept and currently are stored at corporate archive locations at Armstrong.

5. Respondent's Operations

- a. Provide complete addresses of Respondent's plant and other buildings or structures where Respondent carried out its operations in the New England State.**

Armstrong World Industries, Inc.
Braintree Plant
20 Plain Street
Braintree, MA

- b. Provide a brief description of Respondent's operations at each location including**
- i) the date such operations commenced and concluded**
 - ii) the types of work performed at each location, including but not limited to the industrial, chemical or institutional processes undertaken at each location.**

Armstrong operated the Braintree plant from 1936 until 1996 when Armstrong closed the plant and sold the property. See response to 1(h) above regarding operations at plant. The general process to produce the various products at the Braintree plant entailed mixing various raw materials as set out below, milling and extruding them, curing, then cutting, finishing/grinding and packaging the surfaces. Armaflex insulation material was reground and sieved for size before being returned to the process.

- c. If the nature or size of Respondent's operations changed over time, describe changes and dates they occurred.**

See response to 1(h) above. In the 1950s, Braintree manufactured floor tile but ceased that operation in the late 1960s when Braintree plant production focused more on cork and rubber gasket material, textile mill supplies and elastomeric cellular foam insulation. In the late 1970s/early 1980s, Braintree closed and sold the gasket operation.

- d. List the products Respondent manufactured, recycled, recovered, treated or otherwise processed in these operations.**

The Braintree plant manufactured: elastomeric rubber foam insulation, rubberized floor tiles, and textile mill supplies commonly known as cots and aprons; elastomeric cellular insulation, endless cord-reinforced elastomeric belts, elastomeric rollers, rubber and cork-and-rubber-cloth-reinforced roll covering material, rubber and cork-and-rubber-gasket material, and rubber or fiber-reinforced floor tile. The plant also recycled some of the material as apron dust.

- e. **In general terms, list the types of raw materials used in Respondent's operations.**

The Braintree plant used the following types of raw materials: nitrile rubber, sulfur carbon black, plasticizers, cork, celogen (a blowing agent), zinc stearate stabilizers, some additives and colorants, chlorinated paraffin (colorwax), synthetic rubber, PVC resin, rubber processing plasticizers, cork, other rubber chemicals, pigments, and fire retardants.

- f. **Provide copies of MSDSs for materials used in Respondent's operations.**

Enclosed are approximately 14 MSDSs for materials used at the Braintree plant between 1954 and 1986.

- g. **Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to types of materials used to clean/maintain this equipment and the monthly or annual quantity of each such material used.**

Generally, batches were run through mixers to clean them only when color or process changes were required. Clean out batches were disposed of as solid waste. Safety solvents were used occasionally for cleaning equipment.

- h. **Describe the methods used to clean up spills of liquid or solid material during Respondent's operations, including but not limited to: types of material spilled in Respondent's operations; the materials used to clean up those spills; the methods used to clean up those spills; where the materials used to clean up those spills were disposed of.**

Spilled or scrap plasticizers or lubricating oils were burned on-site in a boiler. Small spills were cleaned up with speedy dry, booms and wood flour and disposed of in solid waste dumpsters.

- i. **Provide a schematic diagram or flow chart that fully describes and or illustrates the Respondent's operations.**

Armstrong has no such diagram or flow chart.

6. Respondent's Wastes and Waste Streams (including By-Products)

Substance	Physical State when Disposed / Type or Container	Trade Name/ Chemical composition	Volume (per month)	Disposal method and Location (year)
Adhesives	May be dried.	'Elmer's' type glue	No volume (empty containers)	Empty steel drums went to recycler
Asbestos	Used at Braintree plant until early 70s			Disposed of as part of raw finished products
Adsorbents (from spills, leaks, etc.)	Solid material; dirty; cleaned up	New Pig Corp. pigs, Speedy Dry, wood flour, lubricating oils	Negligible	Went into the general trash
Batteries	Solid, original container			Large ones traded in on contract; recycled
Lubricants				Burned in boilers
Oils	Liquids		Couple gallons per month	Burned except oil containing vanadium; boilers were permitted for oil fired no. 2 fuel oil .
Oil Filters	Solid			Drained and in common trash
Caustics / Alkalis	Used in chlorine tanks and in chillers – consumed in process	Chlorine and ammonia	No known volume	Neutralized and put to sewer; tanks flushed periodically
Cleaning compounds or fluids	Liquid	1,1,1 trichloroethane; kerosene	Small amount	Disposed according to regulatory guidelines or burned in boiler

Coolants	Machine shop coolants;			Oil based were burned; none was flashed off in boiler and evaporated.
Degreasers	Liquid (evaporated)	1,1,1, trichloroethane and kerosene;		Used until evaporated/ kerosene was burned.
Filters	Air filters for ducts; no equipment filters; screens for cleaning pond water when used for maintenance equipment.		1 - per monthly	Furnace filters disposed as solid waste in dumpster
Flammable, Reactive or Explosive Materials	Liquid (evaporated)	Acetone -- cleaning solution for trademarks received in gallon can	Small volume	Consumed in process, not disposed
Insulating/ Fire Proofing materials	Solids, (our own production material)	Own products; vulcanized and unvulcanized material nitrile elastomeric material; armaxflex; chemical composition nitrile PVC; paraffin, aluminum trihydrate, misc. chemical vulcanizing agent, blowing agents	1- 40 yard containers per week to several per day	Landfill
Laboratory Wastes	Solids, curing chemicals, see above; incorporated into products during testing	Accotex, nitrile rubber, animal glue, competitor products; (rubatex, halstead-mitchell,) sample testing quantities; vulcanized and unvulcanized rubber compounds; cork and	May be 100 to 1000 pounds	Dumpster

		rubber compounds; plasticizers, rubber curing chemicals, plasticizers		
✓	Lubricants	Mineral oil burned		Maybe 10 gallons per month
	Other		Steel, aluminum, stainless steel copper	Scrap steel, etc. sold to scrap dealer
✓	Paints	Solid	Building paint or equipment paint waste	Small quantities used for general plant maintenance
	Pigments	Solid	Carbon black; powders for products	No volume Dumpster
	Toners	Solid waste	Cartridges	Couple per year Dumpster
	Pretreatment sludges/ solutions (sewage)	Solid/semi solid	Accottex and textile material; from lagoon sludge -- lagoon cleaning;	Volume -- not known; Not known
✓	Rags, used (Indicate prior use)	Solid; (Wiping cloth for machinery as part of maintenance not production;)	Generally used with safety solvent	Unknown Dumpsters supplied and returned by outside contractor
	Septic System Wastes	Removed by contractor		
	Sludges	Ground 'aprons' went to wet dust collector, then spread out to be solidified; collected for solid disposal	Green cured rubber dust	Landfill; Dyer was carrier

Solutions of Polymers, resins, plastics	Unknown	Similar to 'Elmers' glue; water based solution		Liquid, burned in boilers
✓ Solvents	Liquid	MEK	Small volume	Followed proper waste disposal techniques; location not known;
Waste Oils	Liquids	Not known	No known volume	Burned in boilers
✓ 1,1,1 – Trichloroethane	In rags (clean ups)		No known volume;	Evaporated (rags & degreasers)

NOTES:

Sludge -- stopped generation in 1982 when system went to dry collectors (from wet collectors). Dumpsters went to Braintree dump; 40 cu yard containers were hauled off-site by contractors as noted.

- b. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.**

None available; waste came from mixing operations as well as calendaring and extrusion operations of the process and small amount of waste generated from packaging operations (cardboard, paper).

- c. Identify the person(s) responsible for collecting and managing each type of waste.**

Unknown.

- d. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal / recycling/ sale/ transport, including the type of container in which each type of waste was placed/ stored and where each type of waste was collected/ stored.**

All Braintree plant waste was collected in steel corrugated containers that measured 4' x 4' x 5'; they were stored at various locations around the plant. Two lift trucks took the containers to compactors on a regular basis.

7. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste including By-Products

- a. Identify all individuals who currently have or who have had responsibility for the disposal, treatment, storage, recycling or sale of Respondent's wastes.**
- b. Identify all individuals who currently have and those who have had knowledge of the disposal / treatment storage/ recycling / sale of Respondent's wastes.**
- c. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters.**
- d. For the previous three responses, also provide each individual's:
job title
duties
dates performing those duties
supervisors for those duties
current position or if such individual is no longer employed by Respondent, the date of the resignation
The nature of the information possessed by such individuals concerning Respondent's waste management.**

As the Braintree plant is closed, no one at Armstrong currently has responsibility for handling wastes or environmental matters at the Braintree plant. Tally Lauter, who worked at the Braintree plant from 1970 until July 1996, previously had such knowledge or responsibility. Mr. Lauter's positions at Braintree included industrial engineer, general supervisor, manufacturing supervisor, Human Resources Manager, and site manager. The Braintree plant hired outside waste haulers in 1972. Prior to 1972, the plant hauled waste to the Braintree landfill. Mr. Lauter's supervisors while he worked at the Braintree plant included Jack Landerberger (1970-1980), D. Curry Pettis (1986), Gerry Gigon, Matt Cook and Mike Osborne (dates unknown).

- e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:
the type of container
the colors of the containers
any distinctive stripes or other markings on those containers
any labels or writing on those containers, including content of those labels
whether those containers were new or used
if those containers were used, a description of the prior use of the container**

A dark green 40 yard container bore the name "Armstrong." Cal's Enterprises had on site a 40 yd container used to transport material to the Braintree landfill which may have been burgundy. Suburban also had a green 40 yd container used to transport material to the Braintree landfill.

- f. For each type of waste, describe Respondent's contracts, agreements or other arrangements for its disposal, treatment or recycling.**
- g. Provide copies of such contracts or other documents reflecting such agreements or arrangements.**
- h. State where Respondent sent each type of its waste for disposal, treatment, or recycling.**
- i. Identify all entities and individuals who picked up waste from Respondent or who otherwise transported waste away from Respondent's operations.**

Response to f) through i): Prior to 1970, the Braintree plant disposed of waste in a landfill on plant property, at the Braintree landfill or at the Braintree incinerator. In 1972, the plant began disposing of waste through Suburban Disposal, then owned by George Troupe (now deceased). From 1973 until approximately 1986, the Braintree plant disposed of waste through Cal's Enterprises of Berkeley, MA (subsequently bought by Waste Management).

- j. If Respondent transported any of its waste away from its operations, please answer all questions related to Waste Carriers with reference to Respondent's operations.**

See response to 7(i) above.

- k. For each type of waste specify which Waste Carrier picked it up.**

See response to 7(i) above.

- l. For each type of waste, state how frequently each Waste Carrier picked up such wastes.**

Wastes were picked up approximately 4 days a week. Armaflex waste was picked up 2 to 3 times per week. Wastes were picked up from the other plant compactor approximately 2 times per week on average.

- m. For each type of waste, state the volume picked up by each Waste Carrier (per week, month or year).**

Braintree does not have information regarding the volume of each waste picked up by each waste carrier. As set out above, wastes were stored in site in 40 cubic yard containers which were emptied or disposed of when filled.

- n. For each type of waste state the dates (beginning and ending) such waste was picked up by each waste Carrier.**

See response to 7(i) above.

- o. Provide copies of all documents containing information response to previous seven questions**

Braintree has no such documents.

- p. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to**
the type of vehicle (flatbed truck, tank truck, containerized dumpster truck, etc.)
names or marking on the vehicles
the color of such vehicles

Armstrong used dark green trucks with the name "Armstrong" on the side. Suburban used green container trucks with white letters and the name "Suburban" on them. Cal's used container trucks that may have been burgundy and had the name "Cal's Enterprises" on the side.

- q. Identify all of each Waste Carrier's employees who collected Respondent's wastes.**

Mr. Quintiliano (a now deceased Armstrong employee) collected wastes for Armstrong. Armstrong has no further information regarding carrier employees.

- r. Indicate the ultimate disposal/ recycling/ treatment location for each type of waste**

Cal's Enterprises disposed of Braintree plant waste at Cal's site in Berkeley, MA and, on one occasion, at Cohseet, MA.

- s. Provide all documents indicating the interim and ultimate disposal / recycling / treatment location for each type of waste.**

The Braintree plant is closed and has no such documents.

- t. Describe how Respondent managed pickups of each waste. including but not limited to:**

the method for inventorying each type of waste
the method for requesting each type of waste to be picked up
the identity of the waste carrier employee/ agent contacted for pickup
of each type of waste
the amount paid or the rate paid for the pickup of each type of waste
the identity of Respondent's employee who paid the bills
the identity of the individual (Name and title) and company to whom
Respondent sent the payment for pickup of each type of waste

The waste haulers arrived at the Braintree plant on a regular basis and were told which 40 yard container was full and ready to be emptied. David McIntosh and Bill Westerman paid the bills for the waste disposal service for Braintree at different times from 1970 to 1990. Both individuals are retired, and Armstrong has no information on their location. The Braintree plant sent payments to George Troup of Suburban Enterprises and to Cal's Enterprises for disposal services.

- u. **Identify the individual or organization (e.g. the respondent, the waste carrier or if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.**

The disposal location was decided by the waste hauler.

- v. **State the basis for and provide any documents supporting the answer to the previous question.**

The answer is based on the Braintree plant's standard and specific practice as recalled by the individuals identified above in response to Request No. 1. The Braintree plant is closed and can locate no such documentation.

- w. **Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:**
 - the nature and chemical composition of each type of waste**
 - the dates on which those wastes were disposed**
 - the approximate quantity of those wastes disposed by month and year**
 - the location to which these wastes drained (e.g. on-site septic system, on-site storage tank, pretreatment tank, POTW, etc.)**
 - whether and what pretreatment was provided**

Other than drainage from a chlorine treatment operation, nothing other than water or public waste went to the sewer after 1970. No later than 1970, water and public wastes were drained to the publicly owned treatment works through the Braintree sewer system;

- x. **Identify any sewage authority or treatment works to which Respondent's waste was sent**

Braintree Sewer Department.

- y. **For all settling tank, septic system, or pretreatment system sludges or other treatments wastes resulting from Respondents operations, complete the enclosed Waste Survey and respond to all previous questions of this Information Request with reference to such wastes.**

Septic tanks at the Braintree plant were cleaned out by a contractor. Sanitary waste only went to the septic system.

- z. **If not already provided, specify the dates and circumstances when Respondent's wastes were taken to the Site and identify the companies or individuals who brought Respondent's waste to the Site. Provide all documents which support or memorialize your response.**

As set out in more detail above, neither Armstrong generally nor the Braintree plant specifically has any information indicating that any of Respondent's wastes were taken to the Site by anyone.

8. **Respondent's Environmental Reporting**

- a. **Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.**

The Braintree plant is closed and cannot locate the requested information.

- b. **Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.**

The Braintree plant is closed and cannot locate the requested information.

- c. **State the years during which such information was sent/ filed**

The Braintree plant is closed and cannot locate the requested information.

- d. **Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.**

The Braintree plant is closed and cannot locate the requested information.

- e. **State the years during which such information was sent/ filed.**

The Braintree plant is closed and cannot locate the requested information.

- f. List all federal and state environmental laws and regulations under which Respondent has reported to federal and state governments, including but not limited to TSCA, EPCRA, CWA.**

The Braintree plant is closed and cannot locate the requested information.

- g. Identify the federal and state offices to which such information was sent.**

The Braintree plant is closed and cannot locate the requested information.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Armstrong World Industries, Inc., and that the foregoing is complete, true, and correct.

Executed on June 18, 2001.


Signature

Peter A. Scaccia
Type Name

Director, Environment Health and Safety
Title

ATLANTA 262938v2